STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 082009-003 Project Number: 2009-03-076

Parent Company: Foster Materials Inc.

Parent Company Address: 3538 U.S. Highway 63, West Plains, MO 65775

Installation Name: Foster Redi-Mix

Installation Address: 3538 U.S. Highway 63, West Plains, MO 65775

Location Information: Howell County, S36, T25N, R9W

Application for Authority to Construct was made for: The modification of the existing installation 091-0077 by the addition of a ready-mix concrete plant and the increase of production of Foster Materials Asphalt Plant #1. Concrete is produced through a Truck Mix process. The concrete plant has a maximum hourly design rate (MHDR) of 80 tons per hour (tph). The concrete plant and asphalt plant will be considered the same installation. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

☐ Standard Conditions (on reverse) are applicable to this permit.

☑ Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

AUG 13 2009

EFFECTIVE DATE
STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devises shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments’ Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources’ personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075); by the Missouri Rules listed in Title 10, Division 10 of the Codes of State Regulations (specifically 10 CSR 10-6.060); by 10 CSR 10-6.060 paragraph (12)(A)10. “Conditions required by permitting authority”; by 10 CSR 10-6.010 “Ambient Air Quality Standards” and 10 CSR 10-6.060 subsections (5)(D) and (6)(A); and by control measures requested by the applicant, in their permit application, to reduce the amount of air pollutants being emitted, in accordance with 10 CSR 10-6.060 paragraph (6)(E)3.

1. Best Management Practices
   Foster Redi-Mix and Foster Materials Asphalt Plant # 1 shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing Best Management Practices, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.

2. National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM$_{10}$)
   A. The operator(s) for Foster Materials Inc. (091-0077) shall ensure, while operating at this site, that the ambient impact of PM$_{10}$ at or beyond the nearest property boundary does not exceed 150 µg/m$^3$ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
   B. The total daily ambient impact of PM$_{10}$ at this site shall include the combined impact of the concrete plant and any ambient background concentration from installations or equipment located on the same site as the concrete plant.
   C. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A, Daily Ambient PM$_{10}$ Impact Tracking Record, or other equivalent form(s), will be used for this purpose.

3. Baghouse(s) Control System Requirements
   A. Foster Redi-Mix shall install and operate baghouse(s) to restrict the emission of particulate matter. The baghouse(s) must be used whenever these units are in operation. The baghouse(s) shall be installed on the following units: Cement Unloading (EP 3), Cement Supplement Unloading (EP 4), Weigh Hopper (EP 5), and Truck Mix Loading (EP 6).
   B. Foster Redi-Mix shall install instruments to monitor the operating pressure drop across the baghouse. All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer’s preventive maintenance recommendations. The operator(s) shall check and record the pressure drop across the baghouse filter once per operating day during silo loading. The baghouse operating pressure drop shall be maintained according to manufacturer’s specifications.
   C. The operator(s) shall conduct and document a quarterly inspection and maintenance of the baghouse for structural component failures, for leaks and wear, and for the cleaning sequence of the baghouse. Replacement bags shall be kept on hand at all times to replace defective bags (The bags shall be made of fibers appropriate for the operating conditions expected to occur). All inspections, corrective actions, and instrument calibrations shall be recorded.

4. Restriction on Minimum Distance to Nearest Property Boundary
   The primary emission point of the concrete plant, which is the Mixer Loading (EP 6), shall be located at least 100 feet from the nearest property boundary whenever it is operating at this site.

5. Record Keeping Requirement
   The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

6. Reporting Requirement
   The operator(s) shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

7. **Superseding Condition**
The conditions of this permit supersede the following special conditions found in the previously issued construction permit(s) (032004-007) from the Air Pollution Control Program.
   A. Special Condition 1
   B. Special Condition 5
TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

INSTALLATION DESCRIPTION

Foster Materials Inc. currently has a permitted asphalt plant on site 091-0077. The asphalt plant is a de minimis source under construction permits and has not been issued an operating permit. The plant is located in Howell County and the max hourly design rate is 60 tons/hour. The current permit has a daily PM$_{10}$ limit associated with it.

The following permits have been issued for site 091-0077:

Table 1: Other Permits Issued for Site 091-0077

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Completed</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>032004-007</td>
<td>2/20/2009</td>
<td>Asph Plant – Section 5 Permit Issued</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

Foster Materials Inc. was contacted and approved the combining of the asphalt and concrete plant into one installation. In order to be considered one installation they must belong to the same industrial grouping, be located on one or more contiguous or adjacent properties, and be under the control of the same person (or persons under common control.) 40 CFR Part 52.21(b)(5) and (6). Asphalt plants and ready-mix concrete plants do not have same SIC codes but both these plants are located on the same property and are owned by the same company. Foster Materials Inc. does share employees which is considered support relationship and justifies the determination of one installation.

Foster Materials Inc. currently has a permitted asphalt plant on site 091-0077. They are adding a ready-mix concrete plant to the site. The new concrete plants' emissions are greater than the Insignificant Emissions Exemption Levels located in 10 CSR 10-6.061(3)(A) which warrants a permit. Foster Materials Inc. is also increasing production of the asphalt plant by adding BMPs to the site and using updated emission factors. This permit will consider the operation of the asphalt and ready-mix concrete plant as solitary because they are considered one installation. An ambient air impact analysis will be run for both plants in order to establish ambient impact factors for concurrent operation. The special conditions concerning the daily PM$_{10}$ limit and prohibition of concurrent operation of the asphalt plant have been superseded and either restated for the entire installation or removed completely. Emission units: Cement Unloading (EP 3), Cement Supplement Unloading (EP 4), Weigh Hopper (EP 5), and Truck Mix Loading (EP 6) will all have baghouse control devices in order to reduce emissions. BMPs will be implemented on the entire installation. The emission points are listed in the attached spreadsheet summary. The asphalt plant is on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2] however they are considered major at 250 tons per year. The installation is located in Howell County, an attainment area for all criteria air pollutants.

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutant of concern is PM$_{10}$ and CO. The potential emissions were calculated from the maximum hourly design rate (MHDR) of the equipment, appropriate emission factors, control device efficiencies, and the limiting operating hours at MHDR. The existing potential emissions are the potential emissions just from the asphalt plant. The asphalt plant was re-evaluated with the addition of BMPs and updated emission factors. The sources of the emission factors and control efficiencies are listed in the section "Permit Documents". Based on the conditioned potential emissions, the operation is considered a de minimis source under 10 CSR 10-6.060 section (5).
Table 2: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM10</td>
<td>15.0</td>
<td>18.15</td>
<td>0.65</td>
<td>11.04</td>
<td>29.19</td>
<td>8.45</td>
</tr>
<tr>
<td>SOx</td>
<td>40.0</td>
<td>1.64</td>
<td>2.11</td>
<td>N/A</td>
<td>1.64</td>
<td>0.77</td>
</tr>
<tr>
<td>NOx</td>
<td>40.0</td>
<td>32.16</td>
<td>1.19</td>
<td>N/A</td>
<td>32.16</td>
<td>14.98</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>9.47</td>
<td>0.35</td>
<td>N/A</td>
<td>9.47</td>
<td>4.41</td>
</tr>
<tr>
<td>CO</td>
<td>10.0/25.0</td>
<td>0.94</td>
<td>0.00</td>
<td>N/A</td>
<td>0.94</td>
<td>0.94</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>0.94</td>
<td>0.00</td>
<td>N/A</td>
<td>0.94</td>
<td>0.94</td>
</tr>
</tbody>
</table>

Note: N/A = Not Applicable

* Existing potential emissions taken from the re-evaluation of the asphalt plant with BMPs and new emissions factors.
** Potential Emissions of the Application base on the asphalt plant being run 24 hours/day at MHDR (worst case scenario).
*** Conditioned potential based on daily production limit from ambient impact analysis and the worst case scenario. Other pollutants proportionately reduced.

**AMBIENT AIR QUALITY IMPACT ANALYSIS**

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The ambient impact was evaluated at a distance of 100 feet to the nearest property boundary for both the asphalt and concrete plant. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m³ of PM10 at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an ambient impact factor for the asphalt and concrete plant. This ambient impact factor is incorporated into the daily record keeping table, Attachment A. The asphalt plant and the ready-mix concrete plant will balance production and track emissions in order to stay in compliance the NAAQS standard of 150 µg/m³ of PM10.

For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20 µg/m³ of PM10. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 µg/m³ of PM10 at or beyond the nearest property boundary.

The plant is permitted to operate under the following two conditions:

**Solitary Operation:**
Solitary Operation is defined as operation when no other installations are present on the property. During Solitary Operation, the plant must record its daily production to insure that the National Ambient Air Quality Standard (NAAQS) is not exceeded.

**Concurrent Same-Owner Operation:**
Concurrent Same-Owner Operation is defined as operation when other plants owned by Foster Materials Inc. are located on the property. During Concurrent Same-Owner Operation, Foster Materials Inc. may balance and record the daily production from all plants such that the NAAQS is not exceeded.

**Concurrent Separate-Owner Operation:**
Concurrent Separate-Owner Operation is defined as operation when other plants not owned by parent company are located on the property. During Concurrent Separate-Owner Operation, the plant must reduce its ambient impact to address the impact for the non-owned plants.

**Concurrent Same-and-Separate-Owner Operation:**
Concurrent Same-and-Separate-Owner Operation is defined as operation when plants owned by Foster Materials Inc. and plants not owned by Foster Materials Inc. are located on the property. During Concurrent Same-and-Separate-Owner Operation, Foster Materials Inc. may balance the daily production from all owned plants with a reduced impact to account for the impact from the non-owned plants to insure that the NAAQS is not exceeded.
Table 3: Ambient Air Quality Impact Analysis of PM$_{10}$, 24-Hour Averaging Time

<table>
<thead>
<tr>
<th>Operation</th>
<th>Ambient Impact Factor (µg/m$^3$/ton)</th>
<th>Modeled Impact (µg/m$^3$)</th>
<th>*Background (µg/m$^3$)</th>
<th>NAAQS (µg/m$^3$)</th>
<th>***Daily Production Limit (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Asphalt</td>
<td>Concrete</td>
<td>129.90</td>
<td>20.00</td>
<td>150.00</td>
</tr>
<tr>
<td>1. Solitary</td>
<td>0.1938</td>
<td>0.1083</td>
<td>129.90</td>
<td>20.00</td>
<td>150.00</td>
</tr>
<tr>
<td>2. Concurrent, Same Owner</td>
<td>0.1938</td>
<td>0.1083</td>
<td>129.90</td>
<td>20.00</td>
<td>150.00</td>
</tr>
<tr>
<td>3. Concurrent, Same and Separate Owner</td>
<td>0.1784</td>
<td>0.1053</td>
<td>105.5</td>
<td>44.50</td>
<td>150.00</td>
</tr>
<tr>
<td>4. Concurrent, Separate Owner</td>
<td>0.1784</td>
<td>0.1053</td>
<td>105.5</td>
<td>44.50</td>
<td>150.00</td>
</tr>
</tbody>
</table>

* Background PM$_{10}$ level of 20.00 µg/m$^3$ from haul roads and stockpiles
** The operator(s) must balance production among concurrently operating plants, with the ambient impact factors for each, such that NAAQS is not exceeded. Other ambient impact factors are listed in Attachment A
*** Production Limit based on each individual plant operating by itself

APPLICABLE REQUIREMENTS

The owner is subject to compliance with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements.

- Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110
- Operating Permits, 10 CSR 10-6.065
- An Operating Permit application is required for this installation within 30 days of equipment startup.
- Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170
- Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220
- Restriction of Emission of Odors, 10 CSR 10-3.090
- Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400
- Restriction of Emission of Sulfur Compounds, 10 CSR 10-6.260
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required, I recommend this permit be granted with special conditions.

Gerard Fox
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Foster Materials Inc. as the owner and operator of the installation.
- Environmental Protection Agency (EPA) AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- Southeast Regional Office Site Survey.
- Best Management Practices
### Attachment A: Daily Ambient PM$_{10}$ Impact Tracking Record
Foster Materials Inc., 091-0077 – Solitary and Concurrent (Same)

**Project Number:** 2009-03-076  
**County, CSTR:** Howell County (S36, T25N, R9W)  
**Primary Unit Size:** 80 tph (concrete plant) and 60 tph (asphalt plant)  
**Distance to Nearest Property Boundary:** 100 feet

This sheet covers the period from _______________ to _______________ (Month, Day, Year)  
*(Copy this sheet as needed.)*

| Date | Foster Redi-Mix  
091-0077  
Project #: 2009-03-076 | Foster Materials Asphalt Plant #1  
Plant ID: 091-0077  
Project #: 2009-03-076 | Plant Name:  
Plant ID:  
Project #: | Plant Name:  
Plant ID:  
Project #: | #Background PM$_{10}$ Level (µg/m$^3$) | #TOTAL PM$_{10}$ Level (µg/m$^3$) |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>Daily Production (tons)</td>
<td>Ambient Factor (µg/m$^3$/ton)</td>
<td>*Daily PM$_{10}$ Impact (µg/m$^3$)</td>
<td>Daily Production (tons)</td>
<td>Ambient Factor (µg/m$^3$/ton)</td>
<td>*Daily PM$_{10}$ Impact (µg/m$^3$)</td>
</tr>
<tr>
<td></td>
<td>1,200</td>
<td>0.1083</td>
<td>129.96</td>
<td>N/A</td>
<td>0.1938</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.1083</td>
<td>0.1083</td>
<td>0.1938</td>
<td>20.00</td>
<td>20.00</td>
<td></td>
</tr>
</tbody>
</table>

**Note 1:** The Daily PM$_{10}$ Impact (µg/m$^3$) for each plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.  
**Note 2:** Background PM$_{10}$ Level (µg/m$^3$) is from Haul Roads and Stockpiles.  
**Note 3:** The TOTAL PM$_{10}$ Level (µg/m$^3$) is calculated by summing the Daily PM$_{10}$ Ambient Impact(s) and the Background PM$_{10}$ Level. A TOTAL PM10 Level of less than 150 µg/m$^3$ in any 24-hour period indicates compliance.  
**Note 4:** This Daily PM$_{10}$ Impact column is for any additional, same owner, plants that locate on this site.
Attachment B: Daily Ambient PM$_{10}$ Impact Tracking Record
Foster Materials Inc., 091-0077 – Concurrent (Same and Separate) and Concurrent (Separate)

Project Number: 2009-03-076
County, CSTR: Howell County (S36, T25N, R9W)
Primary Unit Size: 80 tph (concrete plant) and 60 tph (asphalt plant)
Distance to Nearest Property Boundary: 100 feet

This sheet covers the period from ___________ to ___________ (Month, Day, Year) (Copy this sheet as needed.)

| Date | Foster Redi-Mix 091-0077 Project # 2009-03-076 | Foster Materials Asphalt Plant #1 Plant ID: 091-0077 Project #: 2009-03-076 | | | | |
|------|-------------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------|
|      | Daily Production (tons) | Ambient Impact Factor (µg/m$^3$/ton) | $^a$Daily PM$_{10}$ Impact (µg/m$^3$) | Daily Production (tons) | Ambient Impact Factor (µg/m$^3$/ton) | $^a$Daily PM$_{10}$ Impact (µg/m$^3$) | $^a$Daily PM$_{10}$ Impact (µg/m$^3$) | $^b$Back-ground PM$_{10}$ Level (µg/m$^3$) | $^c$TOTAL PM$_{10}$ Level (µg/m$^3$) |
| Example | 800 | 0.1053 | 84.24 | N/A | 0.1784 | N/A | N/A | N/A | 44.50 | 128.74 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |
| | 0.1053 | 0.1053 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 0.1784 | 44.50 | 44.50 |

Note 1: The Daily PM$_{10}$ Impact (µg/m$^3$) for each plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.
Note 2: Background PM$_{10}$ Level (µg/m$^3$) is from Haul Roads and Stockpiles and from other plants not owned by Foster Materials, Inc.
Note 3: The TOTAL PM$_{10}$ Level (µg/m$^3$) is calculated by summing the Daily PM$_{10}$ Ambient Impact(s) and the Background PM$_{10}$ Level. A TOTAL PM10 Level of less than 150 µg/m3 in any 24-hour period indicates compliance.
Note 4: This Daily PM$_{10}$ Impact column is for any additional, same owner, plants that locate on this site.
Attachment AA: Best Management Practices (BMPs)- Construction Industry
Fugitive Emissions

Construction Industry Sites covered by the Interim Relief Policy shall maintain Best Management Control Practices (BMPs) for fugitive emission areas at their installations when in operation. Options for BMPs are at least one of the following:

**For Haul Roads:**

1. **Pavement of Road Surfaces** –
   A. The operator(s) may pave all or any portion of the haul roads with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve “Control of Fugitive Emissions” while the plant is operating.
   B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
   C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the haul road(s) as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. **Usage of Chemical Dust Suppressants** –
   A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the unpaved portions of the haul roads. The suppressant will be applied in accordance with the manufacturer’s suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
   B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
   C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

3. **Usage of Documented Watering** –
   A. The operator(s) shall control the fugitive emissions from all the unpaved portions of the haul roads at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating. For example, the operator(s) shall calculate the total square feet of unpaved vehicle activity area requiring control on any particular day, divide that product by 1,000, and multiply the quotient by 100 gallons for that day.
   B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operation (e.g., meteorological situations, precipitation events, freezing, etc.)
   C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
   D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.
   E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

---

1 For purposes of this document, Control of Fugitive Emissions means to control particulate matter that is not collected by a capture system and visible emissions to the extent necessary to prevent violations of the air pollution law or regulation. (Note: control of visible emission is not the only factor to consider in protection of ambient air quality.)
For Vehicle Activity Areas around Open Storage Piles:

1. Pavement of Stockpile Vehicle Activity Surfaces –
   A. The operator(s) may pave all or any portion of the vehicle activity areas around the storage piles with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating.
   B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
   C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. Usage of Chemical Dust Suppressants –
   A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the vehicle activity areas around the open storage piles. The suppressant will be applied in accordance with the manufacturer’s suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
   B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
   C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

3. Usage of Documented Watering –
   A. The operator(s) shall control the fugitive emissions from all the vehicle activity areas around the storage piles at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating. (Refer to example for documented watering of haul roads.)
   B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operations (e.g., meteorological situations, precipitation events, freezing, etc.)
   C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
   D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.
   E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
RE: New Source Review Permit - Project Number: 2009-03-076

Dear Mrs. Foster:

Enclosed with this letter is your New Source Review permit. Please review your permit carefully and note the special conditions, if any, and the requirements in your permit.

Operation in accordance with the conditions and requirements in your permit, the New Source Review application submitted for project 2009-03-076, and your amended operating permit, if required, is necessary for continued compliance. Please review your amended operating permit, as it will contain all applicable requirements for your concrete plant, including any special conditions from your New Source Review permit.

The section of the permit entitled “Technical Review of Application for Authority to Construct” should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Gerad Fox at the Department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:gfk

Enclosures

c: Southeast Regional Office
   PAMS File: 2009-03-076
   Permit Number: